REMARKS

Claims 1-15 are pending in the present patent application. Claims 1-15 stand rejected. This application continues to include claims 1-15.

Claims 1-5 and 12-15 were rejected under 35 U.S.C. §103(a) as being unpatentable over Rourke, et al., U.S. Patent No. 5,995,721 (hereinafter, Rourke) in view of Reisman, U.S. Patent No. 6,769,009 B1. Applicants request reconsideration of the rejection of claims 1-5 and 12-15 in view of the following.

Rourke is directed to a system which examines the attributes of a document for the purpose of delivering one or more portions of the document to one or more of the document processing subsystems on the basis of the examination of the attributes (col. 1, lines 9-13). A processing system 10 includes a plurality of printers 12-1, 12-2, 12-3, . . . 12-n for processing print jobs and making prints in accordance with the job programming instructions for each job printed (col. 6, lines 45-48). Processing system 10 provides print processing for various workstations or clients 15-1, 15-2, 15-3, . . . 15-n, which may be remote and/or on site, are operatively coupled to printers 12-1, 12-2, 12-3, 12-n through server 25 (col. 6, lines 60-64). Clients 15-1, 15-2, 15-3, . . . 15-n provide the electronic documents that are the source of the print jobs and for this purpose individual ones or all of clients may have a document scanner, disk input, keyboard, fax, etc. for generating the electronic documents that comprise the job to be printed (col. 7, lines 2-7). Clients 15-1, 15-2, 15-3, . . . 15-n include a User Interface 16 enabling programming selections for print jobs to be made in the form of an electronic job ticket 35 that allows a user to program a print job for transmission to server 25 (col. 7, lines 7-20).

Thus, Rourke essentially discloses clients 15-1 . . . 15-n that generate electronic documents using keyboards, scanners, faxes, to create a print job in the form of a job ticket that allows the user to transmit the print job to server 25 for printing on printers 12-1, etc.

Reisman is directed to enabling a user at a user station to select a personalized set of information channels from a listing of available information channels (col. 1, lines 29-31) in order to enable simple, economical and prompt mass distribution of electronic information products (col. 5, lines 16-17). Reisman discloses a system for distributing information to a plurality of user stations, each configured for communications with a multiplicity of servers via a non-proprietary network (col. 5, lines 30-33). A workstation 10 is communications-equipped for communication with remote services, for example by modem, which includes an operating system services 10, a containing information product 12, and an information transport component or module 14 (col. 6, lines 47-54). Information transport component 14 provides a general purpose facility for sending and fetching information objects between an end user's computer (the client) and a central server (col. 6, lines 58-61).

Applicants believe that claims 1-5 and 12-15 patentably define Applicants' invention over Rourke for at least the reasons set forth below.

Claim 1 is directed to a server system for a document processing system. Claim 1 recites a plurality of input sources, a plurality of input source servers connected to said input sources, said input source servers being configured to receive a plurality of digital files from said input sources; and a central server connected to said input source servers, said central server being configured to receive said digital files from said input source servers and perform at least one action on at least one of said digital files.

The Examiner acknowledges that Rourke does not disclose, teach, or suggest the plurality of input servers, as recited in claim 1.

In contrast to a plurality of input source servers connected to said input sources, said input source servers being configured to receive a plurality of digital files from said input sources; and a central server connected to said input source servers, said central server being configured to receive said digital files from said input source servers and perform at least one action on at least one of said digital files, Reisman discloses a system for distributing information to a plurality of user stations, each configured for communications with a multiplicity of servers via a non-proprietary network (col. 5, lines 30-33). Although Reisman discloses an information transport component 14, the transport component 14 functions as universal or generic client interface software, enabling a user client to work with any one or more of many online server-based information distribution services (col. 23, lines 45-48), and can be contained in each of a number of information products 12 distributed by one or more publishers to one or more sets of customers (col. 29, lines 62-64), and is not a server.

Accordingly, Reisman does not disclose, teach, or suggest the subject matter of claim 1.

The Examiner asserts that it would have been obvious to one of ordinary skill in the art to combine Rourke with Reisman. Applicants respectfully disagree that Applicants' invention would be obvious over Rourke in view of Reisman, for at least the reasons set forth below.

The combination of Rourke and Reisman would not yield Applicants' claimed invention, since Applicants claimed invention is a 3-tier system wherein two of the tiers are servers, whereas both Rourke and Reisman are 2-tier systems with no servers tiered with respect to each other and with respect to an input source.

For example, rather than a plurality of input source servers being configured to receive a plurality of digital files from input sources, and a central server connected to the input source servers, the central server being configured to receive the digital files from the input source servers, not from the input sources, Rourke merely discloses that clients 15-1, etc. generate print jobs that are transmitted to server 25 via an electronic job ticket 35.

Stated differently, whereas Applicants claimed invention is a 3-tier system having one source tier and two server tiers, Rourke discloses a 2-tier system having one source tier and one server tier. For example, the first tier of Applicants' invention are the input sources recited in claim 1, the second tier of Applicants' invention are the input source servers that receive the digital files from the input sources, and the third tier of Applicants' invention is the central server that receives the files from the input source servers. Because Applicants' second tier are servers, it is possible that the input sources may include other computers, such as personal computers (see Applicants specification at page 2, lines 26-28).

In contrast, Rourke's 2-tier system employs the clients 15-1, etc., that generate print jobs as a first tier, and the print jobs are provided to the printers via the second tier, which is server 25. Rourke discloses as input to clients 15-1 a scanner, keyboard, disk input, fax, etc., each of which are known in the art to be peripheral devices that operate via the computer to which they are attached. However, Rourke does not disclose, teach, or suggest that clients 15-1, etc., receive input from other computers that are acting in the capacity of servers or that clients 15-1, etc., otherwise function as servers.

Regarding Reisman, as clearly depicted in Fig. 12, Reisman discloses a 2-tier system for distributing information to a plurality of user stations, each configured for communications with a multiplicity of servers via a non-proprietary network (col. 5, lines 30-33).

In addition, Rourke and Reisman, taken alone or in combination, do not disclose, teach, or suggest any motivation to combine two purportedly operational 2-tier systems to achieve a 3-tier system, as recited in claim 1. Rather, the Rourke and Reisman systems are purportedly operational in of themselves, and do not require modification to achieve their respective intended purposes.

Accordingly, for at least the reasons set forth above, Applicants respectfully submit that the cited references, Rourke in view of Reisman, taken alone or in combination, do not disclose, teach, or suggest the subject matter of claim 1. Claim 1 is thus believed allowable in its present form.

Claims 2-5 are believed allowable due to their dependence, directly or indirectly, on otherwise allowable base claim 1. In addition, claims 2-5 further and patentably define the invention over Rourke and Reisman, taken alone or in combination.

Claim 12 is directed to a server system for a document processing system, said server system comprising a server configured to perform a plurality of operations on a single digital file.

Rourke and Reisman, taken alone or in combination, simply do not disclose, teach, or suggest a server system for a document processing system, said server system comprising a server configured to perform a plurality of operations on a single digital file, as recited in claim 12, nor does the Examiner assert as much. Rather, Rourke discloses only that a server that performs a single function on a print job, that is, routing the print job to one or more printers for printing (col. 7, lines 15-22, Fig. 2), and Reisman discloses that information transport component 14 provides a general purpose facility for sending and fetching

information objects between an end user's computer (the client) and a central server (col. 6, lines 58-61).

Accordingly, for at least the reasons set forth above, Applicants submit that claim 12 is allowable in its present form.

Claims 13-15 are believed allowable due to their dependence, directly or indirectly, on otherwise allowable base claim 12.

Accordingly, for at least the reasons set forth above, Applicants respectfully request that the rejection of claims 1-5 and 12-15 under 35 U.S.C. 103(a) be withdrawn.

Claims 6-11 were rejected under 35 U.S.C. §103(a) as being unpatentable over Senn, et al., U.S. Patent No. 6,151,610 (hereinafter, Senn) in view of Rourke. Applicants request reconsideration of the rejection of claims 6-11 in view of the following.

Senn is directed to the representation and manipulation of documents on a display device, for example, using a scripting language, to keep a system open to commands at all times so as to prevent a "busy" cursor on a computer (col. 1, lines 11-12, and lines 25-30). The Senn summary discloses a document management apparatus that has a scripting language that controls documents by setting the attributes of documents, wherein attributes are pieces of data within a document (col. 1, lines 33-35). Documents are stored in a repository (col. 6, line 56). A user may retrieve documents from different repositories (col. 7, lines 17-18). A repository server serves the documents to clients, and includes a search engine and an interface to process search requests (col. 7, lines 37-42). The scripts are used to control the renderer of the document (col. 11, lines 27-40).

Applicants believe that claims 6-11 patentably define Applicants' invention over Senn, for at least the reasons set forth below.

Claim 6 is directed to a method of processing a digital file. Claim 6 recites, in part, building a job object including a plurality of action objects, and performing the action objects on the digital file. The action objects pertain to emailing, printing, faxing, and/or converting the document to another format (see Applicants specification at page 3, lines 11-15, and page 4, line 4), wherein the job object may cause multiple operations, e.g., emailing, printing, faxing, and/or converting the document to another format, to be performed on the document.

Senn does not disclose, teach, or suggest building a job object including a plurality of action objects, and performing the action objects on the digital file. In contrast to claim 6, Senn merely discloses that attributes of a document are set by scripts (col. 1, lines 33-35), and that the scripts are used to control the renderer of the document (col. 11, lines 27-40). The Senn "attributes" have nothing to do with action objects that pertain to, for example, emailing, printing, faxing, and/or converting the document to another format, each of which may be performed on a given document (see Applicants specification at page 3, lines 11-15, and page 4, line 4).

Rather, the Senn "attributes" pertain to displaying a document on a computer monitor. For example, an "attribute," as defined by Senn, is a piece of data stored in a document (col. 2, line 49), and can be modified by a script (col. 2, line 60). In Senn, attributes describe the display of the document in a 3-dimensional visual workspace, for example, the X, Y, and Z positions (col. 4, lines 18-27). In addition, "ephemeral attributes" define the display characteristics of the associated document, such as position and size, and reflect the actions of the user in manipulating the screen object of a document within a workspace, typically through using an interface device such as a mouse (col. 5, lines 22-25). An "intrinsic

attribute" is a special ephemeral attribute that every document must have, which directly effects the display of the screen object (col. 5, lines 43-45).

Thus, "attributes" in Senn are data that pertain to the display of a document in a workspace, and have no bearing on and do not disclose, teach, or suggest building a job object including a plurality of action objects, and performing the action objects on the digital file, as recited in claim 6, wherein a job object including one or more action objects pertains to, for example, emailing, printing, and faxing and/or converting the document to another format (see Applicants specification at page 3, lines 11-15, and page 4, line 4).

Although Rourke discloses that a document job is characterized by a set of job attributes with each job attribute relating to a manner in which the document job is to be processed by the document processing system (col. 9, lines 9-12), the Rourke attributes pertain to job level attributes (e.g. set quantity, copy count, finishing requirements, plex and page numbering), page level attributes (e.g. stock color separation information, image quality, reduction/enlargement and sides to be imaged), and image level attributes (e.g. size of image, color of image, location of image relative to a page) (col. 7, lines 22-28).

However, the Rourke attributes and use thereof does not relate to or disclose, teach, or suggest building a job object including a plurality of action objects, and performing the action objects on the digital file, as recited in claim 6, wherein a job object including one or more action objects pertains to, for example, emailing, printing, and faxing and/or converting the document to another format (see Applicants specification at page 3, lines 11-15, and page 4, line 4).

Accordingly, for at least the reasons set forth above, Applicants respectfully submit that the cited references, Senn in view of Rourke, taken alone or in combination, do not

disclose, teach, or suggest the subject matter of claim 6. Claim 6 is thus believed allowable in its present form.

Claims 7-11, are believed allowable due to their dependence, directly or indirectly, on otherwise allowable base claim 6. In addition, claims 7-11 further and patentably define the invention over Senn in view of Rourke.

Accordingly, for at least the reasons set forth above, Applicants respectfully request that the rejection of claims 6-11 under 35 U.S.C. 103(a) be withdrawn.

For the foregoing reasons, Applicants submit that no combination of the cited references teaches, discloses or suggests the subject matter of the appended claims. The pending claims are therefore in condition for allowance, and Applicants respectfully request withdrawal of all rejections and allowance of the claims.

In the event Applicants have overlooked the need for an extension of time, an additional extension of time, payment of fee, or additional payment of fee, Applicants hereby conditionally petition therefor and authorize that any charges be made to Deposit Account No. 20-0095, TAYLOR & AUST, P.C.

Should any question concerning any of the foregoing arise, the Examiner is invited to telephone the undersigned at (317) 894-0801.

Respectfully submitted,

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